

UNITED STATES DISTRICT COURT  
for the  
Southern District of Texas

NOV 17 2020

David J. Bradley, Clerk

United States of America

v.

)

Case No.

M-20-2492-M

Manuel GARCIA  
YOB: 1984  
USC

)

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 26, 2020 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 21, U.S.C. §§ 846,841(a)(1)	Conspiracy to Possess with Intent To Distribute 28 grams or more of a cocaine base (crack cocaine); and
Title 21, U.S.C. § 841(a)(1)	Possession with Intent To Distribute approximately 126 grams of cocaine base (crack cocaine)

This criminal complaint is based on these facts:

See Attachment "A"

 Continued on the attached sheet.

Approved:

Robert Weller & ANSA  
11-17-2020

Complainant's signature

Ryan Hammer, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 11/17/2020 @ 3:57 PMCity and state: McAllen, Texas

J. Scott Hacker, United States Magistrate Judge

Printed name and title

**Attachment "A"**

**Affidavit in Support of Complaint**

I, Ryan J. Hammer, being first duly sworn, state as follows:

**Introduction**

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since June of 2016. I am currently assigned to the San Antonio Division, McAllen office where I conduct a variety of investigations pertaining to gangs and violent crime. I attended the FBI Academy in Quantico, Virginia, which entailed 21 weeks of training in law enforcement and investigative activities. In the performance of my duties, I have investigated and assisted in the investigation of violent criminal organizations to include home invasion crews, gangs, kidnappings, and assaults on federal officers. I have received training from the FBI pertaining to the investigation of such matters to include extensive training on cellphone analysis and call detail records, as well as social media accounts and their analysis. In addition, I have conferred with FBI colleagues with extensive training and experience in the investigation of violent criminal organizations.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. All references to agents include FBI agents as well as FBI task force officers (TFOs). Your affiant knows that it is a violation of Title 21 United States Code Section 841(a)(1) to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute or dispense, a controlled substance.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of the offenses listed above have been committed by **Manuel GARCIA** (hereinafter “**GARCIA**”).

**Facts Supporting Probable Cause**

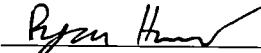
4. The FBI has been conducting an investigation on the drug trafficking activities of **GARCIA** and the Tri-City Bombers in the Rio Grande Valley. Beginning on July 2, 2019 and continuing through July, 2020, your affiant and other agents with the FBI utilized an FBI confidential human source (CI#1) to conduct recorded phone calls with **GARCIA**. In these calls, **GARCIA** offered to sell CI#1 handguns, rifles, ammunition, cocaine, and crack cocaine.

5. On June 25, 2020 your affiant and other agents with the FBI utilized CI#1 to make several recorded calls with **GARCIA** in order to arrange another purchase of crack cocaine from **GARCIA**. In these calls, the amount of cocaine, the cost, and cooking it into crack cocaine were discussed. On June 25, 2020, under the direction and surveillance of your affiant and other agents with the FBI, CI#1 conducted a controlled purchase of crack cocaine from **GARCIA**. On the afternoon of June 25, 2020, **GARCIA** met CI#1 in San Juan, Texas. CI#1 provided **GARCIA** with \$3400 USD in exchange for a bag containing a white rock like substance suspected to be crack cocaine. The bag field tested positive for the presence of crack cocaine and weighed 126.0 grams. The evidence item was later sent to the Drug Enforcement Agency (DEA) laboratory and is still pending analysis. A video recording of the controlled purchase was captured and agents identified **GARCIA** as the individual providing the crack cocaine in exchange for the money.

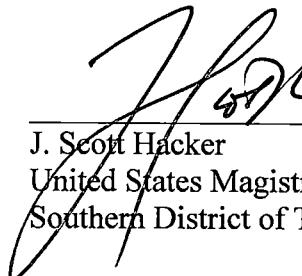
**Conclusion**

6. Based on the aforementioned factual information, your Affiant respectfully submits that **GARCIA** did commit a violation of Title 21, United States Code Sections 846, 841(a)(1) (Conspiracy to Possess with Intent to Distribute a Controlled Substance; and a violation of Title

21, United States Code, Section 841(a)(1) (Possession with Intent to Distribute a Controlled Substance).

  
\_\_\_\_\_  
Ryan Hammer  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before me this 17<sup>th</sup> day of November, 2020.

  
\_\_\_\_\_  
J. Scott Hacker  
United States Magistrate Judge  
Southern District of Texas